

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
MIDLAND/ODESSA DIVISION**

VIRTAMOVE, CORP,

Plaintiff,

v.

AMAZON.COM, INC.,  
AMAZON.COM SERVICES LLC, and  
AMAZON WEB SERVICES, INC.,

Defendants.

Civil Action No. 7:24-cv-30-ADA-DTG

**DECLARATION OF JEREMY A. ANAPOL IN SUPPORT OF  
DEFENDANTS' OPPOSITION TO VIRTAMOVE'S PARTIAL MOTION TO DISMISS**

I, Jeremy A. Anapol, declare and state as follows:

1. I am a partner in the law firm of Knobbe, Martens, Olson & Bear, LLP. I am counsel for Defendants Amazon.com, Inc., Amazon.com Services LLC, and Amazon Web Services, Inc. (collectively, “Amazon”) in this action and I appear *pro hac vice*. I make this declaration based on my personal knowledge except where otherwise specified. I have added highlighting to some exhibits listed below to make cited information easier to find.

2. Attached hereto as Exhibit A is a true and correct copy of the “Sign up for AWS” web page showing that users are required to read and accept the AWS Customer Agreement when they sign up.

3. Attached hereto as Exhibit B is a true and correct copy of the “Sign up for AWS” web page showing that users indicate their acceptance of the AWS Customer Agreement by clicking a checkbox confirming that they “have read and agree to” its terms.

4. Attached hereto as Exhibit C is a true and correct copy of excerpts from the transcript of a Rule 30(b)(6) deposition of VirtaMove’s corporate designee, Susan Cameron.

5. Attached hereto as Exhibit D is a true and correct copy of a page from VirtaMove’s web site. I retrieved this page from <https://virtamove.com/partners/>.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 7th day of November, 2024 at Irvine, California.

/s/ Jeremy A. Anapol

November 7, 2024

Respectfully submitted,

*Of Counsel:*

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By: /s/ Jeremy A. Anapol

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*and Amazon Web Services, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 7, 2024, all counsel of record who are deemed to have consented to electronic service were served with a copy of the foregoing via the Court's CM/ECF System.

/s/ Jeremy A. Anapol  
Jeremy A. Anapol